

## CDPHE Comments on Analytical Results Report: Rico, Colorado

- ✓1. Page 3 states the lime treatment plant at the St Louis has been in operation since 1984. This is incorrect as its cessation of operation was in part what triggered the DOJ lawsuit.

- ✓2. Page 4 & 5 indicates, incorrectly, that wastes from ~~numerous~~ <sup>LEAVE OUT</sup> other locations were consolidated in the Columbia tail pile. It is my knowledge that only wastes from the Pro Patria, Shamrock, Silver Swan were consolidated here.

- ✓3. Sections 5.1 & 8.1 refer to "erosion cuts" in the cap of the tailings pile from which source samples were collected. In order to put the magnitude of this issue in perspective, the narrative should indicate the frequency and size (i.e. "approximately 6" channels every "X" feet whose pathway is complete to the surface water body").

LEAVE IN  
BUT SAY  
"APPEARANCE  
OF"

- ✓4. Section 6.2 refers to an estimate of the number of residents on ground water wells. It is unclear how this estimate was made, or if an estimate should be made.

- ✓5. Section 7: Surface Water Pathway

- ✓a. It appears this pathway was inconsistently sampled. At times samples are collected from side channels, or seeps and other times samples are collected directly from the mainstem of the water body. When discussing the trend in sample results (specifically SW-05, 06) the narrative implies these are samples from the mainstem, when they are actually side channels or seeps. A side channel or likely a seep along the east side of the Dolores in the area of the cyanide leach pad and St Louis ponds was not sampled.

EXPLAIN  
IN MORE  
DETAIL

- NOT  
SW-07  
COLLECTED  
DOWN GRAB  
OF STAINING  
b. SW-08 appears to have been collected in the mainstem of Silver Creek upstream of the Argentine seep, thereby missing any effect from the seep. The narrative implies this was collected from 100' downstream of the workings but the location is in the mainstem. Regardless, 100' downstream in the mainstem would still miss any impacts from the Argentine seep, a major source to surface water.

- LOOKING TO  
DO C. A RELEASE  
NOT SPECIFIC  
ATTRIBUTION  
c. Not all surface water seeps were sampled. Silver Swan, Rico Boy/Santa Cruz were not sampled along the Dolores. Additionally there is a draining adit on the south side of Silver Creek which I believe has never been sampled and may confuse impacts attributable to the Argentine seep.

- d. Section 7.2 should note what classification Silver Creek carries. Fishery?

- ✓6. Section 8.4 Soil Analytical Results

It would be appropriate to discuss the sampling results from the school property. This sample is likely to be of most interest to the community in general.

LEAVE OUT  
& TALK @  
PUBLIC MEETING

- ✓7. Typographic error

Dolores county is misspelled in Figure 1.